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Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Petition by the U.S.)

Department of Transportation for)

Assignment of an)

Abbreviated Dialing Code)

File No. NSD-L-98-380

CC Docket No. 92-105

COMMENTS ON PETITION FOR ASSIGNMENT

MCI WorldCom Inc. ("MCI WorldCom") files these comments in response to the Public Notice¹ seeking comment on the petition for assignment filed by the Department of Transportation ("DOT") March 8 requesting the Federal Communications Commission ("Commission") for nationwide assignment of the 211 dialing code for access to travel-related information to the public. MCI WorldCom supports the use of abbreviated dialing arrangements to serve important public service goals, such as the function proposed by DOT. Given that we now have competing petitioners seeking a 211 assignment², MCI WorldCom believes the Commission should initiate a comprehensive review by the Commission of all abbreviated dialing arrangements, including scarce "N11" codes.

DISCUSSION

N11 codes are the eight unique, available three-digit telephone numbers for which the last two digits are both "1" and the first digit is not "0" or "1" — including the well-

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¹ Public Notice, CC Docket No. 92-105, NSD-L-99-24, released April 20, 1999.

² Petition for Assignment of 211 Dialing Code for Use by the Public to Access Essential Public Resources, filed May 28, 1998 ("AIRS Petition"). The petition remains pending.

known “911” emergency services and “411” directory information services dialing arrangements. As a form of “abbreviated” dialing arrangement, the reservation and assignment of N11 codes was addressed by the February 1997 N11 Order,³ in which the Commission assigned 311 and 711 on a nationwide basis to serve, respectively, non-emergency police services and telecommunications relay services (“TRS”). The N11 Order found that N11 numbers “must be allocated in a consistent manner on a nationwide basis” and a “uniform numbering plan,” is “capable not only of serving incumbents, but also of accommodating new market entrants,” and an “essential prerequisite to an integrated public switched telephone network.” N11 Order ¶¶ 57-58, 66.

As in the petition filed by the AIRS Petitioners last year, and the petition filed by the DOT this year, the numbering administration question posed is broader than just whether the proposed assignment of 211 for either reason would, standing alone, serve a useful and important purpose. N11 codes are the most scarce of all numbering resources in the North American Numbering Plan (“NANP”). Indeed, because the N11 Order requires that all local exchange carriers “must be able to have their customers call 611 and 811 to reach their repair and business service offices,” N11 Order ¶2, the 211 code is one of only two remaining N11 codes in the NANP. Unless and until the Commission reallocates the 611/811 LEC repair numbers for other national purposes, granting either the AIRS or DOT Petitions would virtually exhaust the available N11 numbers. All other services, no matter how important to the public, would be essentially relegated to other dialing arrangements. And, as these two petitions show, very worthwhile services are vying for scarce N11 numbers.

Before reserving or assigning one of the last two available N11 codes, the Commission should conduct a comprehensive review of abbreviated dialing arrangements, including N11 numbers. The N11 Order directed the North American Numbering Council (“NANC”) to report to the Commission on abbreviated dialing arrangements. The NANC’s “Abbreviated Dialing Ad Hoc Working Group” report is completed and public comment on it has been filed. As the N11 Order recognized, other abbreviated dialing arrangements — such as 555-XXXX, 976-XXXX, #XX, *XX and others — are available and currently in use for various public and commercial information services. For the public to benefit from N11 codes, such arrangements must be implemented by all carriers in all geographic areas. A sensible approach to assignment of 211 would be for the Commission to prepare, in light of the NANC recommendations and these petitions, a Notice of Proposed Rulemaking (“NPRM”) addressing the important numbering policy and related questions raised by abbreviated dialing arrangements.

The questions include, among others:

- Whether N11 codes may be used only for non-profit public interest services; including whether to migrate 611 and 811 for ILEC repair and billing office function, to another dialing arrangements;
- What criteria the Commission should use to ensure that N11 allocations are given their highest public interest purpose, and if for non-profit use, whether it should be relevant to the Commission

³ The Use of N11 Codes and Other Abbreviated Dialing Arrangements, First Report and Order and Further Notice of Proposed Rulemaking 12 FCC Rcd. 5572, CC Docket No. 92-105, FCC 97-51 (1997) (“N11 Order”).

whether there is adequate funding and resources to operate information service proposed;

- How default routing arrangements and cost recovery mechanisms for public service N11 calls will be handled in a competitive, multi-provider, wireline and wireless local exchange environment;
- Whether existing commercial for profit uses of N11 codes (such as 511 in some locations) should be reallocated;
- Whether under the N11 Order state commissions and local jurisdictions retain power to authorize abbreviated dialing arrangements or to determine uses for N11 codes other than 311;
- On what schedule should incumbent LECs, rural and small LECs, competitive LECs and CMRS providers be required to complete the switch translations necessary for routing of N11 calls;
- Which other abbreviated dialing arrangements should be made available for commercial information service providers and the relative costs and benefits compared to N11;
- Whether non-N11 abbreviated dialing arrangements can be available ubiquitously without a Commission requirement that all LECs route such calls to the appropriate service provider; and
- How to ensure that abbreviated dialing arrangements offered by incumbent LECs are appropriately subject to unbundling, resale and structural separation requirements.

A multitude of information services, both public and commercial, can be made available via abbreviated dialing arrangements. A comprehensive review by the Commission is needed of numbering, cost recovery, routing, interconnection and jurisdictional issues associated with all abbreviated dialing arrangements, including scarce N11 codes. Even if the question were limited to N11 numbers alone, there still are basic public policy questions, including whether these codes should be reserved only for

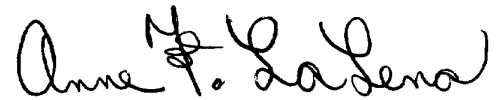
non-profit public interest purposes, that should be answered definitively before the last few N11 codes are assigned.

CONCLUSION

The Commission should release an NPRM proposing a comprehensive framework for administration of N11 codes and other abbreviated dialing arrangements. In light of the scarcity of N11 numbers, the Commission should combine the AIRS Petition and the DOT Petition in the framework of this broader approach to abbreviated dialing.

Respectfully submitted,

MCI WorldCom Inc.,

A handwritten signature in cursive script, reading "Anne F. La Lena". The signature is written in dark ink and is positioned above a horizontal line.

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July 20, 1999

CERTIFICATE OF SERVICE

I, Barbara Nowlin, hereby certify that a copy of the foregoing MCIWorldCom Comments on the Petition for Assignment File No. NSD-L-98-380 and CC Docket No. 92-105 was served on this 20th day of July by first class mail upon the following:

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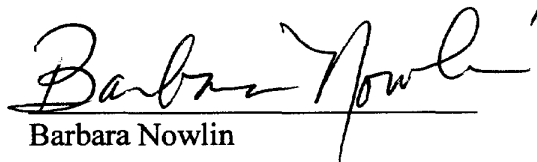
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